

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION	MDL 2724 16-MD-2724
THIS DOCUMENT RELATES TO: <i>ALL ACTIONS</i>	HON. CYNTHIA M. RUFÉ ORAL ARGUMENT REQUESTED

**DEFENDANT TEVA PHARMACEUTICALS USA, INC.’S
MOTION FOR LIMITED EXCEPTION TO PTO 214**

Defendant Teva Pharmaceuticals USA, Inc., (“Teva”), by and through its undersigned counsel, hereby moves this Honorable Court for a limited exception to Pretrial Order No. 214 (“PTO 214”) as to Ms. Patel in advance of her deposition to allow Teva to: (1) examine Ms. Patel concerning her prior statements to DOJ during her upcoming deposition; and (2) produce to all MDL parties the memoranda of DOJ’s interviews of Ms. Patel (“Patel MOIs”), subject to the confidentiality provisions of the MDL Protective Order and the criminal Stipulated Protective Order, so that the MDL parties may use them in Ms. Patel’s deposition. The factual and legal basis for this Motion are set forth more fully in the accompanying Memorandum of Law.

Pursuant to Local Rule 7.1(f), Teva respectfully requests oral argument on this Motion.

Dated: May 9, 2023

Respectfully submitted,

/s/ Alison Tanchyk

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Counsel for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2023, I caused a copy of the foregoing Motion to be served on counsel of record via the Court's CM/ECF system and that copies of sealed materials have been delivered to the Court and all counsel of record.

/s/ Alison Tanchyk
Alison Tanchyk